



STATE OF IDAHO  
DEPARTMENT OF  
ENVIRONMENTAL QUALITY

444 Hospital Way #300 • Pocatello, Idaho • 83201

C.L. "Butch" Otter, Governor  
Toni Hardesty, Director

September 6, 2011

City of Rockland  
P.O. Box 113  
Rockland, Idaho 83271

Attn: Honorable Eddy Hansen, Mayor

Re: Wastewater NPDES Inspection – Updated Report  
Power County - Rockland  
NPDES Permit # ID-002204-7

Honorable Mayor Hansen:

I would like to thank you for your assistance with the NPDES Compliance Inspection of the City of Rockland wastewater treatment facilities on June 23, 2011. Scott MacDonald, Wayne Crowther, and I performed the NPDES inspection along with the help of James Kariger and yourself representing the City. We would also like to thank your staff for their assistance in completing this inspection. A copy of the completed Inspection Report Form 3560-3, photo log, and graphical data taken from Discharge Monitoring Reports (DMR) is enclosed for reference.

### **Permit Review**

One of the first items of business was to review relevant paperwork including the NPDES permit (#ID-002204-7). The permit authorizes discharge from the wastewater facility located in Rockland to receiving waters named Rock Creek. This permit was issued by the EPA on January 7, 2002 and expired at midnight January 8, 2007. The permit renewal application was received and deemed complete by the EPA on August 17, 2006. Several parts of the permit were discussed in detail including:

Part 1.A of the permit includes the effluent limitations and monitoring requirements imposed on the wastewater system with discharge limits. The permit includes load limits which change throughout the year for BOD and TSS however concentration limits remain constant.

Part I.B. of the permit outlines surface water monitoring requirements. Quarterly samples for temperature, pH, and total ammonia as N are required. Discharge Monitoring Report (DMR) forms must include this information. Monthly DMR forms

must also include the flow measurements taken Monday through Friday when the facility is discharging.

Part I.B.1 indicates a monitoring station shall be established in Rock Creek above the influence of the facility's discharge, and must be approved by IDEQ and EPA.

Part I.C and Part I.D. of the permit require the development and implementation of an Operation and Maintenance Plan and Quality Assurance Plan respectively.

Part I.E of the permit outlines the minimum dilution requirements indicating the facility may only discharge when the flow in Rock Creek immediately upstream of the outfall provides a minimum dilution ratio of 50:1. The City should include an attachment to monthly DMR forms which includes the daily upstream flows, daily effluent flows, and daily dilution ratios.

Part I.F requires the permit holder to acquire the necessary equipment, and initiate upstream monitoring within Rock Creek to demonstrate compliance with the 50:1 dilution requirement. The permit holder may alternatively propose a methodology to EPA and IDEQ used to calculate upstream flow.

Part III.E requires the permit holder to, at all times, properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the permittee to achieve compliance with the conditions of the permit.

All other areas of the permit were reviewed to ensure staff understanding; continued review and evaluation of the permit is essential to maintain compliance.

### **Inspection Findings**

The City of Rockland wastewater treatment system consists of three (3) treatment lagoons comprising approximately 4 acres. The lagoons are situated in the valley bottom near the confluence of the South Fork of Rock Creek with the East Fork of Rock Creek.

The lagoon dikes were clear of animal holes and vegetation. Rock placement was observed around the perimeter of the dikes.

Control valves between the lagoon cells and the outfall control valve were noted as being in poor shape showing signs of extensive rust. Mayor Hansen indicated the control valves had been recently broken free after being seized for some time. No attempt was made to operate the valves during the inspection.

The effluent flow measurement control box was flowing as designed with steady flow over the V-notch weir. Flow out of the weir was observed to be discharging to the South

Fork of Rock Creek through a small channel. The discharge point is approximately 300 feet upstream from the confluence with the East Fork of Rock Creek. Daily flow measurements are taken in a culvert in the East Fork of Rock Creek approximately 800 feet above the confluence with the South Fork of Rock Creek.

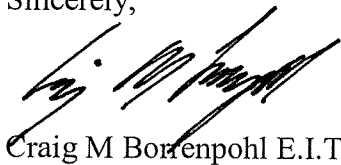
No equipment or other means of reliable flow measurement were observed in the South Fork of Rock Creek immediately upstream of Outfall 001.

Document reviews included the Operation and Maintenance Plan, Quality Assurance Plan, lab slips, and DMR forms. The Operation and Maintenance Plan contains sections for each component of the treatment facility and does include provisions for exercising control valves at the treatment lagoons. The Quality Assurance Plan is representative of the collection and analysis of effluent and receiving water sample requirements in support of the permits. The lab slips and DMR forms which were inspected did not include dilution ratio information.

Mayor Hansen, thank you for the information regarding Rockland's planning efforts for future wastewater disposal. The City of Rockland is currently developing a land application site for final disposal of effluent from the wastewater treatment lagoons. Rockland has completed a Facilities Planning Study and is on the fundable list for a loan from the State Revolving Fund Loan Program for fiscal year 2012. These planned upgrades will eliminate discharge to Rock Creek. Please keep the EPA and IDEQ informed of your planning and construction progress.

Again we appreciate the City staff's assistance. Please contact us at (208) 236-6160 should you have questions or if we can provide further assistance.

Sincerely,



Craig M. Borrenpohl E.I.T.  
Water Quality Engineer



Wayne Crowther P.E., CPESC  
Water Quality Engineer

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TRIM Reference: 2011AGF1678